

***SI2Way, Inc.***  
103 Tompkins Circle Staten Island, NY 10301  
352.584.2318 Phone

February 29, 2008

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: Certification of CPNI Filing  
EB-06-TC-060 EB Docket 06-36

Dear Ms. Dortch:

Transmitted herewith in accordance with the Commission's Public Notice, DA 06-223, is our compliance certificate and accompanying statement for the year ended December 31, 2007.

Very truly yours,

Andrew Gerald, President

### CERTIFICATION

I, Andrew Gerald, hereby certify this 29th day of February, 2008 that I am an officer of SI2Way, Inc., and that I have personal knowledge that SI2Way has established operating procedures that are adequate to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R. §§ 64.2001-2009.

Andrew Gerald  
President

## STATEMENT

SI2Way, Inc. ("Carrier") has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of consumer proprietary network information ("CPNI").

- Carrier has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Carrier continually educates and trains its employees regarding the appropriate use of CPNI. Carrier has established disciplinary procedures should an employee violate the CPNI procedures established by Carrier.
- Carrier maintains a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. Carrier also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- Carrier has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, Carrier's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI.